

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a PORNHUB.COM,
MG FREESITES II LTD., MINDGEEK
S.A.R.L., MINDGEEK USA, INC., MG
BILLING LTD., and HAMMY MEDIA LTD.
d/b/a XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

WISEBITS IP, LTD.'S MOTION TO
DISMISS PURSUANT TO FRCP 12(b)(2)
and 12(b)(6)

Pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), Defendant Wisebits IP, Ltd. (“WIP”) respectfully moves for the Court to dismiss Plaintiffs’ Fifth Amended Complaint (“FAC”) as it applies to WIP because: (a) the Court lacks personal jurisdiction over WIP, a foreign company incorporated in Cyprus with a principal place of business in Limassol, Cyprus; and (b) the FAC fails to state a claim upon which relief may be granted.

In support of this Motion, WIP relies on the accompanying Memorandum of Law.

Respectfully Submitted,

/s/ Hannah Rogers Metcalfe

Hannah Rogers Metcalfe, Fed ID. 9943
Metcalfe & Atkinson, LLC
1395 South Church Street
Greenville, South Carolina 29605
(864) 214-2319
hmetcalfe@malawfirmssc.com

Evan Fray-Witzer (*pro hac vice application forthcoming*)

CIAMPA FRAY-WITZER, LLP

20 Park Plaza, Suite 505

Boston, Massachusetts 02116

Telephone: 617-426-0000

Facsimile: 617-423-4855

Evan@CFWLegal.com

Valentin D. Gurvits (*pro hac vice application forthcoming*)

Frank Scardino (*pro hac vice application forthcoming*)

BOSTON LAW GROUP, PC

825 Beacon Street, Suite 20

Newton Centre, Massachusetts 02459

Telephone: 617-928-1804

Facsimile: 617-928-1802

vgurvits@bostonlawgroup.com

frank@bostonlawgroup.com

Attorneys for Wisebits IP, Ltd.

December 23, 2022

Greenville, South Carolina